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UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

THOMAS COREY CROSBY

CRIMINAL COMPLAINT

CASE NUMBER: 09-2881 SKG

I, the undersigned complainant, being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about January 29, 2009, in the District of Maryland, the defendant(s), (Track Statutory Language Offense)

Thomas Corey Crosby, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess a firearm, to wit: a .40 caliber Glock handgun, serial number KNZ763, in and affecting commerce,

in violation of Title 18 United States Code, Section(s) 922(g)(1). I further state that I am a Special Agent for the Drug Enforcement Administration, and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☐ Yes ☐ No

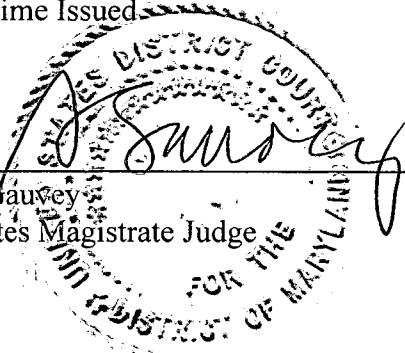
Todd C. Edwards

Todd C. Edwards, Special Agent  
Drug Enforcement Administration

Sworn to before me and subscribed in my presence,

8/21/09 at 9:05 AM  
Date and Time Issued at Baltimore, Maryland

Susan K. Gauey  
Susan K. Gauey  
United States Magistrate Judge



09-2881-SKG

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### **AFFIDAVIT**

This affidavit is submitted in support of a criminal complaint charging Thomas Corey Crosby with possession of a firearm by a convicted felon, in violation of 18 U.S.C. §922(g)(1).

### **Your Affiant**

Your affiant, Todd C. Edwards, is a Special Agent of the Drug Enforcement Administration ("DEA"). As such, your affiant is a law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18 of the United States Code, that is, an officer empowered by law to conduct investigations of, and make arrests for, offenses enumerated in Section 2516 of Title 18.

Your affiant has been a duly sworn member of the DEA for approximately 15 years. Your affiant successfully completed the DEA Training Academy, where your affiant received formal training in the fields of narcotics investigation, drug identification, methods of concealment, and distribution of controlled substances. Since becoming a DEA agent, your affiant has participated in numerous investigations of unlawful drug trafficking. Your affiant has participated in the arrests of over 100 individuals for violations of the narcotics laws of the State of Maryland and the United States of America. Your affiant has also participated in numerous debriefings of those involved in the abuse and distribution of controlled substances. Your affiant has recovered or participated in the recovery of substantial quantities of cocaine, cocaine base, heroin, marijuana, and various paraphernalia for the distribution, packaging, and manufacturing of controlled substances. Your affiant has made over 50 affidavits in support of search and seizure warrants which have targeted violations and violators of criminal narcotics laws, and has

09-2881-SKG

P50

participated in the execution of over 150 search and seizure warrants where evidence of such violations were recovered.

Through your affiant's training, education and experience, your affiant is familiar with the manner in which illegal narcotics are transported, stored and distributed, and with the methods of payment for such drugs. Your affiant has been allowed to testify as an expert witness in the field of the investigation of controlled dangerous substance violations in the United States District Court for the District of Maryland.

Unless otherwise noted, the following facts and circumstances are known to your affiant through reports made by the officers who have first-hand knowledge of the incidents outlined herein. The following does not include every fact and circumstance known to your affiant about Crosby's involvement in the below-described incident, but only recounts those facts necessary for making application for a criminal complaint.

#### **Facts & Circumstances**

On Thursday, January 29, 2009, law enforcement agents sought and obtained a search and seizure warrant from Baltimore City District Court Judge, James Mann that targeted 2805 Poplar Drive, Baltimore, Maryland 21207. That search warrant authorized the search for and seizure of items related to the illegal trafficking of narcotics. According to Maryland real property records, that residence is owned by Thomas Corey Crosby. On Thursday, January 29, 2009, at approximately 11:50 p.m. members of HIDTA DEA Group 51, along with members of the Baltimore County narcotics section, executed said warrant. Thomas Crosby was present at the execution of the search warrant, as wife his wife and child.

09-2881-SKG

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A search of the target location resulted in the following items being seized: \$263,784.00 U.S. currency, and a Glock .40 caliber handgun (serial # KNZ763) with magazine and eleven (11) rounds recovered from the right nightstand in Crosby's bedroom.

Your affiant is familiar with this type of handgun, and recognizes that it is a "firearm" as defined at 18 U.S.C. §921(a)(3). Your affiant further knows by the make of the seized firearm that it was manufactured outside the State of Maryland and therefore its presence in this District effected interstate commerce. Your affiant further knows through a criminal record database that prior to the date of this firearm's seizure, Crosby had been previously convicted of crime punishable by more than one year's imprisonment, specifically possession with intent to distribute (heroin) Sys - use of a minor to distribute heroin (18 months). 7/2

### Conclusion

Your affiant, Special Agent Todd C. Edwards, affirms under penalties of perjury that the facts and circumstances recounted in the foregoing affidavit are true and accurate to the best of his knowledge.

8-21-09

Date

*Todd C. Edwards*

Special Agent Todd C. Edwards  
Drug Enforcement Administration

Signed to and sworn before me this 21 day of August 2009

*Susan K. Gauvey*  
Susan K. Gauvey  
United States Magistrate Judge  
for the District of Maryland